

## Annual FINRA CAT User Account Certification Process For CAT Reporting Agents (CRAs)

The information on this page applies only to CAT Reporting Agents (CRAs).<sup>1</sup>

### When Is the 2021 User Accounts Certification Period?

The 2021 User Accounts Entitlement Certification Period for CRAs is **September 13 – November 15**. During this period, a Certification Representative (CRep) for each organization must certify that accounts with access to CAT applications, data and tools are valid and users are entitled only to the entitlements (privileges) necessary to perform their current job responsibilities.

**To participate in the Annual Account Certification Process, CRAs must have a Certification Representative (CRep) with an active entitlement account.**

To designate or replace a CRep, complete the online [FINRA Entitlement Program Certification Representative \(CRep\) Designation Form](#).

### What is the Annual User Accounts Certification Process?

This mandatory process enhances the protection, integrity and confidentiality of regulatory, proprietary and personal information maintained in CAT applications and tools. FINRA CAT designates a period every year during which organizations must review and certify all users, administrators and machine accounts with access to CAT applications, data and tools using an online user accounts certification process. CRAs must designate a Certification Representative (CRep) to review and certify all accounts.

In addition to the annual review and certification, FINRA CAT strongly recommends that every organization performs periodic reviews to ensure that individuals have the appropriate level of entitlement required to perform their current job responsibilities and modifies or immediately removes access as required.

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<sup>1</sup>Note: The 2021 Certification Period for Industry Members begins in April.

## **How Does a CRA Designate or Replace a Certification Representative (CRep)?**

To designate or replace a CRep, complete the [FINRA Entitlement Program Certification Representative \(CRep\) Designation Form](#). The CRep must be an Account Administrator and have an active entitlement account before the Certification Period begins. The form must be signed and submitted by an Authorized Signatory.

If you are planning to become a new CAT Reporting Agent, your organization must provide the required Entitlement Forms and the [FINRA Entitlement Program Certification Representative \(CRep\) Designation Form](#) as part of the onboarding process for access to be provided.

A CRep is responsible for, and authorized to, review, verify and certify all accounts of the organization. An organization may only have one CRep, and only the CRep is provided entitlement to certify on behalf of the organization.

Organizations that do not have a CRep designated with FINRA CAT before the Certification Period begins will not be able to certify and this will result in follow up for noncompliance as certification is mandatory.

## **What Should Certification Representatives Look for When Performing Annual Entitlement Certification?**

A CRep needs to confirm that access to CAT applications, data and tools is valid for each account and that:

- Each individual has a continuing need to access application(s)/data/tools on the organization's behalf;
- Each individual is entitled only to the privileges needed to perform current job responsibilities; and
- If necessary, coordinate with other AAs to modify entitlements or remove entitlements if specific access is no longer needed, or delete accounts when individuals no longer require access or an individual has terminated from the organization. Note: When access is no longer required, accounts must be immediately deleted.

See the [CRep User Accounts Certification Process Quick Reference Guide](#) for detailed instructions.

## Are There Consequences for Organizations That Do Not Complete the Certification?

The following actions will occur if an organization fails to certify within the designated period:

- Immediately following the certification due date, an organization that fails to certify will have the functionality to create and edit accounts for all their Account Administrators (AAs) automatically disabled and the functionality will remain disabled until the CRep completes the certification process. For security reasons, AAs will continue to be able to disable/delete accounts.
- Failure to certify after the follow up period by FINRA CAT will result in all Entitlement Program accounts (administrators, users and machine to machine accounts) being disabled for that organization—this action requires a CRep to work with the FINRA Entitlement Team to complete the certification process and regain full system functionality.

## Questions?

Contact the FINRA CAT Helpdesk at 888-696-3348 or [help@finracat.com](mailto:help@finracat.com).

## Forms

- [CAT Reporting Agent Agreement \(DocuSign Link\) \(Service Bureaus only\)](#) (Updated 5/15/2020)
- [CAT Reporting Agent Agreement \(PDF for reference\)](#)
- [CAT Reporting Agent Agreement \(Redlined PDF for reference\)](#)
- [FINRA Entitlement Program](#)
  - [CAT Account Administrator Entitlement Form \(Service Bureaus only\)](#)
  - [CAT Entitlement Secure File Transfer Protocol \(SFTP\) Account Industry Members and CAT Reporting Agents](#)
  - [CAT Reporting Agents - FINRA Entitlement Program Certification Representative \(CRep\) Designation Form \(DocuSign Link\)](#)